



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

May 29, 2012

U.S. Army Corps of Engineers, Mobile District  
Planning and Environmental Division  
P.O. Box 2288  
Mobile, AL 36628-0001

Attention: Mr. Philip A. Hegji

**Subject: EPA Comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Widening of the Pascagoula Lower Sound/Bayou Casotte Channel, Pascagoula, Jackson County, MS; CEQ #:20120101; ERP #: COE-E35087-MS.**

Dear Mr. Hegji:

Pursuant to Section 309 of the Clean Air and Section 102(2)(C) of the National Environmental Policy Act (NEPA), EPA, Region 4 has reviewed the subject document. The U.S. Army Corps of Engineers (USACE) project evaluates the consequences of the Jackson County Port Authorities proposal to widen the Pascagoula Lower Sound/Bayou Casotte Channel segment from the Federally authorized width of 350 feet and depth of -42 feet mean lower low water (MLLW) (with 2 ft of allowable over-depth and 2 feet of advanced maintenance) to a width of 450 feet, parallel to the existing channel centerline and to the existing authorized depth of -42 feet MLL. The project also involves the limited widening of the northern portion of the Horn Island Pass channel in the Port of Pascagoula.

The primary purpose and need for the proposed widening is to alleviate current vessel restrictions and increase travel efficiencies for marine vessel moving into and out of Pascagoula and Bayou Casotte Harbor. According to the DEIS, "economic pressure and technological advances have generally resulted in a trend towards the production of larger ships, which has increased channel improvement needs." Specific benefits anticipated include transit during dark hours for crude oil tankers (in ballast) and Panmax bulk carriers. Other benefits include "transit of liquefied natural gas tankers during high wind and current condition, two-way traffic under established conditions and improved terminal operations and increased productions hours due to decreased number of delays."

Three alternatives are examined in the DEIS, including a no-action and two action alternatives (i.e., widening locations and disposal sites). Enlarging the Harbor requires dredging of approximately 38,200 feet (7.2 miles) of the channel. The DEIS identifies a preferred alternative that involves dredging adjacent to the existing Pascagoula Lower Sound/Bayou Cassotte Federal Chanel segment to widen the channel 100 feet on the west side to the existing

depth of -42 feet MLLW (with authorized advanced maintenance and allowable over depth excavation consistent with the Federal project) as opposed to widening the channel 50 feet on either side of the existing Channel segment. This alternative was selected because it alleviates more of the existing vessel transit restrictions (e.g., eases turns) than the project.

According to the DEIS, the project will result in the conversion of 87.6 acres of shallow habitat to deeper habitat and the disposal of approximately 3.4 million cubic yards of dredge material from the channel modification. The implementation of the preferred alternative will involve the placement of approximately 3.7% (125,000 cy) of material in the designated littoral zone area (LZA) for beneficial use and the rest of the material (approx. 3.3 mcy) in the Pascagoula Offshore Disposal Management Disposal Site (ODMDS). While both action alternatives will include relatively similar amounts of new dredge volume, the preferred alternative will result in a smaller amount of material being used for beneficial reuse. Most of the material will be hydraulically excavated by a hopper dredge, but some combination of hydraulic pipeline or mechanical dredge may also be used.

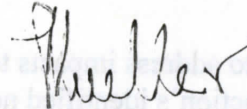
In terms of sediment quality, the DEIS indicates that certain samples are above the lead and dioxin criteria levels. The dioxin TEQ value exceedances were "attributable to the least toxic congener, indicating little likelihood of adverse impacts of dioxin congeners in sediments. Prior to placement of dredged material, concurrence by EPA is needed as to whether or not these findings meet guidance for the Limiting Permissible Concentration (LPC) for lead and dioxin congeners in sediments

Based on our review of this project, we have assigned a rating of EC-1. (environmental concerns, adequate information) to the DEIS. EPA notes that there may be sediment quality issues related to lead and/or dioxin as well as some short term water quality impacts associated with the dredging and placement process. Therefore, please note that there will be separate evaluation and communication regarding the *Marine, Protection, Research, and Sanctuaries Act* Section 103 process including the evaluation of supporting sediment physical, chemical, and biological testing reports, as well as the District Engineer's determination of the material's compliance with the Ocean Dumping Regulations. This review process will occur following the submittal of the DEIS comment letter. In addition, EPA recommends that every effort be made to institute appropriate control measure to reduce potential water quality impacts. In general, we commend the USACE on the beneficial use of some of the material, but would like to more material used in other areas along the Gulfcoast even though we understand that the transport costs can be cost prohibitive."



We appreciate your coordination with us. The EPA technical contacts will be Doug Johnson (404/562-9386) located in our Water Management Division, while our NEPA contact will be Ntale Kajumba (404/562-9620) of my staff.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mueller", with a stylized, cursive script.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosure: EPA Rating System

#### Additional Comments for the ODMDS

The FEIS should discuss the proposed action in context of the ODMDS' Site Management and Monitoring Plan, see: [http://epa.gov/region4/water/oceans/documents/Pascagoula\\_SMMP.pdf](http://epa.gov/region4/water/oceans/documents/Pascagoula_SMMP.pdf)

The DEIS (p. 3-6) does not appear to address the available capacity directly in volume available for the proposed action, e.g., how much of the existing ODMDS is committed to other project uses?

The DEIS does not appear to address impacts to the existing ODMDS, e.g., how much is available for the proposed action's identified need?

Recommendation: The FEIS should clarify how much of the existing project is committed to other project uses and how much is available for the proposed action.